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11 Attorneys for TTAC PUBLISHING, LLC

12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
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16 MICHELLE SHULTZ, individually and
on behalf of others similarly situated,

17 Plaintiff,

18 v.

19 TTAC PUBLISHING, LLC,

20 Defendant.
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Case No. 4:20-cv-4375-HSG

**DECLARATION OF JAY T.
RAMSEY IN SUPPORT OF
DEFENDANT'S NOTICE OF
MOTION AND MOTION TO STAY**

Date: Jan. 7, 2021

Time: 2:00 p.m.

Ctrm: 2, 4th Floor

Honorable Haywood S. Gilliam, Jr.

DECLARATION OF JAY T. RAMSEY

I, Jay T. Ramsey, hereby declare as follows:

1. I am a partner at Sheppard, Mullin, Richter & Hampton LLP, counsel of record herein for Defendant TTAC Publishing, LLC. I make this declaration based on facts known by me to be true and correct, as set forth below.

2. Attached hereto as Exhibit 1 is a true and correct copy of Dkt. No. 15-5 from the trial court docket of the case that resulted in the Southern District of California decision in *Crawford v. Beachbody, LLC*, 2014 WL 6606563 (S.D. Cal. Nov. 5, 2014). The trial court case number was 3:14-cv-01583-GPC-KSC (S.D. Cal.). Exhibit 1 is an exhibit to the motion to compel arbitration filed in that case, and it sets forth the design and content of the website at issue in that case. I downloaded the exhibit from PACER.

3. Attached hereto as Exhibit 2 is a true and correct copy of Dkt. No. 10-4 from the trial court docket of the case that resulted in the Ninth Circuit decision, *Nguyen v. Barnes & Noble Inc.*, 763 F.3d 1171. The trial court case number was 8:12-cv-00812-JLS-DFM (C.D. Cal.). Exhibit 2 is an exhibit to the motion to compel arbitration filed in that case, and it sets forth the design and content of the website at issue in that case. I downloaded the exhibit from PACER.

4. Attached hereto as Exhibit 3 is a true and correct copy of Dkt. No. 24-2 from the trial court docket of the case that resulted in the Central District of California's decision in *Rodriguez v. Experian Servs. Corp.*, 2015 WL 12656919 (C.D. Cal. Oct. 5, 2015). The trial court case number was 2:15-cv-03553-R-MRW (C.D. Cal.). Exhibit 3 is an exhibit to the motion to compel arbitration filed in that case, and it sets forth the design and content of the website at issue in that case. I downloaded the exhibit from PACER.

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct. Executed in Los Angeles, California
3 on December 2, 2020.

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5 /s/ Jay T. Ramsey

6 JAY T. RAMSEY
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